## **HAYNES BOONE**



Jonathan D. Pressment, Esq.

Direct Phone Number: 212-918-8961 Direct Fax Number: 212-884-9561 Jonathan.pressment@haynesboone.com

August 18, 2021

## **BYECF**

The Honorable Gregory H. Woods United States District Court Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 2260 New York, New York 10007

Re: AT&T Corp. v. Atos IT Solutions and Services, Inc., No. 21-cv-4550 (S.D.N.Y.)

Dear Judge Woods:

This firm represents Plaintiff AT&T Corp. ("AT&T") in the above-referenced action. We write pursuant to Rule 1.E of Your Honor's Individual Rules of Practice in Civil Cases to respectfully request an extension of AT&T's time to respond to the Answer and Counterclaims of Defendant Atos IT Solutions and Services, Inc. ("Atos" or "Defendant") from September 3, 2021, to October 18, 2021. Atos does not object to AT&T's request or the proposed adjournment of the Case Management Conference discussed further below.

By way of background, Atos just filed its counterclaims to the Complaint on August 13, 2021. This is AT&T's first request for an extension and is made to enable counsel sufficient time to evaluate Atos' counterclaims and prepare its response and in light of certain competing deadlines faced by AT&T's counsel. In light of the proposed adjournment, we also respectfully request that the Court adjourn the Initial Case Management Conference, currently scheduled for September 3, 2021 (to which the deadline for submission of a proposed Case Management Order is tied) to a date of the Court's choosing following the filing of AT&T's response to Defendant's counterclaims.

We thank the Court for its attention to this matter.

Respectfully submitted,

Jonathan D. Pressment

cc: Counsel for all parties (By ECF)